

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 0:16-mc-61262-JEM

**In re: SUBPOENA TO
BRADLEY J. EDWARDS**

Underlying Case:

VIRGINIA L. GIUFFRE,

Plaintiff

v.

GHISLAINE MAXWELL,

Defendant

No. 15-cv-07433-RWS (S.D.N.Y)

_____/

MOTION TO SEAL BRADLEY J. EDWARDS’
MOTION TO QUASH SUBPOENA OR, IN THE ALTERNATIVE,
FOR A PROTECTIVE ORDER

Subpoena respondent Bradley J. Edwards, a non-party and attorney for the plaintiff in the *Giuffre v. Maxwell* action, hereby files this motion for leave to file materials under seal for his reply in support of his motion to quash.

In his reply to his motion for to quash subpoena, Edwards attached eight exhibits. Five of these exhibits contain a document that is under seal in another court, specifically:

1. Exhibit 1 – Victims Response to Dershowitz Motion to Intervene, under seal in the U.S. District Court for the Southern District of Florida;

2. Exhibit 3 – Ms. Giuffre’s Motion for Leave to Exceed the Presumptive Ten Deposition Limit, the salient portions of which (i.e., the portions relied upon in this case) are under seal in the underlying case in U.S. District Court for the Southern District of New York;

3. Exhibit 4 – Excerpts from the Confidential Deposition of Ghislaine Maxwell, which is under seal in the underlying case in U.S. District Court for the Southern District of New York;

4. Exhibit 5 - Excerpts from the Confidential Deposition of Rinaldo Rizzo, which is under seal in the underlying case in U.S. District Court for the Southern District of New York; and

5. Exhibit 6 – The Opinion of the U.S. District Court for the Southern District of New York (Sweet, J.) in *Giuffre v. Maxwell*, June 20, 2016, which is under seal in the underlying case in the U.S. District Court for the Southern District of New York.

In addition, portions of the reply memorandum itself quote from or refer to the sealed materials. Accordingly, a redacted version of the reply memorandum has been prepared for inclusion in the public court file, which avoid disclosing the sealed information.

Because the indicated materials are under seal by order of other federal courts, Edwards seeks leave to file these materials under seal here. Edwards has followed the procedures of the Southern District of Florida for the handling of sealed materials.

Opposing counsel has simply filed similar materials in this case under seal without seeking leave of court. Accordingly, Edwards believes that opposing counsel would have no objection to his filing of similar materials under seal. Because Edwards believes that a motion is required for a sealed filing, he proceeds by way of motion to this Court.

CONCLUSION

For the forgoing reasons, Edwards respectfully requests that this Court allow him to submit materials under seal in his reply memorandum supporting his motion to quash.

Dated: July 7, 2016

Respectfully Submitted,

/s/ Jack Scarola

Jack Scarola

Florida Bar No.: 169440

Attorney E-Mail(s): jsx@searcylaw.com and
mep@searcylaw.com

Primary E-Mail: _scarolateam@searcylaw.com

Searcy Denney Scarola Barnhart & Shipley, P.A.

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: (561) 686-6300

Fax: (561) 383-9451

Attorney for non-party respondent

Bradley J. Edwards

CERTIFICATE OF SERVICE

I certify that on July 7, 2016, I electrically served the foregoing pleading via the Court's CM/ECF filing system on:

Laura A. Menninger
Jeffrey S. Pagliuca
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: (303) 831-7364
Fax: (303) 832-2628
lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell